

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Hearing Date: December 12, 2024 at 1:00 p.m. (ET)

Objection Deadline: December 6, 2024 at 4:00 p.m. (ET)

Ref. Nos. 27181 & 27200

**CERTIFICATION OF COUNSEL REGARDING DEBTORS' ONE HUNDRED
TWENTY-FOURTH (SUBSTANTIVE) OMNIBUS OBJECTION TO CERTAIN FULLY
OR PARTIALLY UNLIQUIDATED PROOFS OF CLAIM (CUSTOMER CLAIMS)**

I, Matthew R. Pierce, counsel to FTX Recovery Trust², hereby certify as follows to the best of my knowledge, information and belief:

1. On October 23, 2024, the above-captioned debtors and debtors-in-possession (collectively, the “Debtors”) filed the *Debtors’ One Hundred Twenty-Fourth (Substantive) Omnibus Objection to Certain Fully or Partially Unliquidated Proofs of Claim (Customer Claims)* [D.I. 27181, redacted & 27200, sealed] (the “Objection”).

2. Pursuant to the Notice of Objection attached to the Objection [D.I. 27181-1 & 27200-1], any responses to the Objection were to be filed no later than December 6, 2024, at 4:00 p.m. (ET) (the “Response Deadline”).

3. The FTX Recovery Trust received informal responses (the “Informal Responses”)

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

² The FTX Recovery Trust (a/k/a the Consolidated Wind Down Trust) was established on January 3, 2025, the effective date of the Debtors’ confirmed *Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and its Debtor Affiliates* [D.I. 26404-1].

to the Objection from the holders of claim numbers 68076 and 31572.

4. On November 19, 2024 and November 25, 2024, Lucas Brito ("Brito") filed responses to the Objection [D.I. 28063 & 28274] (the "Brito Responses").

5. As of the Date hereof, no other formal responses or other responses to the Objection have been filed or served on the FTX Recovery Trust.

6. The FTX Recovery Trust resolved the response to the Objection from holder of claim number 31572 without modification to the schedule attached to the proposed form of order.

7. The FTX Recovery Trust has revised the proposed form of order (the "Revised Order"), a copy of which is attached hereto as **Exhibit A**, to reflect the adjournments to the Objection solely with respect to the claim of Brito and claim number 68076. A copy of the Revised Order compared against the proposed form of order attached to the Objection is attached hereto as **Exhibit B**. In accordance with the Court's electronic order processing procedures, a clean copy of the Revised Order shall be uploaded to CM/ECF.

8. Accordingly, the FTX Recovery Trust respectfully requests that the Court enter the Revised Order at its earliest convenience.

Dated: February 4, 2025
Wilmington, Delaware

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/s/ Matthew R. Pierce

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